

# American Academy of Pediatrics

DEDICATED TO THE HEALTH OF ALL CHILDREN®



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## Reply to

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July 20, 2016

Victoria Wachino

Deputy Administrator, Center for Medicaid and CHIP Services  
Director, Centers for Medicare and Medicaid Services  
7500 Security Boulevard  
Baltimore, MD 21244

Dear Ms. Wachino:

On behalf of the American Academy of Pediatrics (AAP) I am writing both to thank you and your staff for your generosity with your time in meeting with North Carolina pediatricians and AAP staff on July 12, 2016, and to encourage you to do everything in your power to deny or at the very least delay approval of North Carolina's Medicaid waiver request.

The preservation of the Medicaid program in North Carolina holds national implications. North Carolina's program has served as a model for pediatricians across the country and is often discussed in the context of the Patient-Centered Medical Home. Children in North Carolina whose care is financed by Medicaid enjoy integrated care in the community, with better access to a full array of services than in many other parts of the country. Simply put, the Medicaid program in North Carolina works and works well.

Medicaid in North Carolina should be preserved. We believe three arguments justify denying or significantly modifying the waiver. First, waivers are designed to be demonstrations of concepts to improve the system but the North Carolina system is already functioning well. This waiver request appears to be a solution in search of a problem. Second, the application is requesting to waive aspects of the new CMS Medicaid Managed Care rule. This rule was promulgated quite recently and it is unclear why aspects of it should be waived so precipitously. Third, any change that may impact the health or care of children should be closely evaluated. AAP would urge that North Carolina be held to rigorous benchmarks to ensure child health if the waiver is approved. If the benchmarks are not met, the waiver should be withdrawn.

Thank you for your attention to the views of the American Academy of Pediatrics. If you have any questions regarding the North Carolina waiver, please contact Robert Hall in the AAP's Washington, DC office at 202/724-3309 or [RHall@aap.org](mailto:RHall@aap.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Benard P. Dreyer".

Benard P. Dreyer, MD, FAAP  
President

BPD:rh